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## UNITED STATES DISTRICT COURT

## NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

GSI TECHNOLOGY, INC., a Delaware  
 Corporation,

Plaintiff,

v.

UNITED MEMORIES, INC., a Colorado  
 Corporation,

Defendant.

CASE NO. 13-CV-1081-PSG

**DECLARATION OF CHRISTOPHER J.  
 BEAL IN SUPPORT OF GSI  
 TECHNOLOGY, INC.'S *EX PARTE*  
 APPLICATION FOR (1) TEMPORARY  
 RESTRAINING ORDER; (2) ORDER TO  
 SHOW CAUSE REGARDING  
 PRELIMINARY INJUNCTION; AND (3)  
 EXPEDITED DISCOVERY IN THE  
 ALTERNATIVE**

Date: March 26, 2013

Time: Ex Parte

Judge: Ex Parte

I, Christopher Beal, declare and state as follows:

1. I am an attorney licensed to practice in the state of California and am Of Counsel at the law firm of DLA Piper Rudnick Gray Cary US LLP, counsel of record for Plaintiff GSI Technology, Inc. ("GSI Tech"). I make this declaration in support of GSI Tech's Ex Parte Application for Temporary Restraining Order; Order to Show Cause Regarding Preliminary Injunction; and Expedited Discovery. I have personal knowledge of each of the facts set forth in

1 this declaration and if required, could and would competently testify thereto.

2 2. If the Court finds the evidentiary record insufficient to grant all of the preliminary  
3 relief requested by GSI Tech, then Plaintiff respectfully requests that leave be granted to  
4 undertake narrowly tailored, expedited discovery in the form attached hereto as Exhibits A and B.

5 3. Exhibit A is GSI Tech's request for production of documents ("RFPs"). If  
6 expedited discovery is necessary to support GSI Tech's request for preliminary injunction, GSI  
7 Tech respectfully requests that the Court order that Defendant UMI produce all non-privileged  
8 documents responsive to the RFPs within fourteen days of the date on which the Court issues its  
9 order, delivering all such responsive documents to Plaintiff's counsel's office by close of  
10 business.

11 4. Exhibit B is GSI Tech's Notice of Rule 30(b)(6) Deposition of UMI ("Depo  
12 Notice"). If expedited discovery is necessary to support GSI Tech's request for preliminary  
13 injunction, GSI Tech respectfully requests that the Court order Defendant UMI to produce an  
14 appropriate witness(es) for deposition in response to the categories identified in Exhibit C within  
15 seven days following Defendant's production of documents in response to the RFPs.

16 I declare under penalty of perjury under the laws of the United States of America that the  
17 foregoing is true and correct. Executed this 26th day of March, 2013.

18  
19   
Christopher Beal